#### ACTION

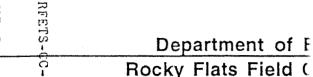
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BORGMAN, K.A.		
BUHL, T.R.		
CARD, R.G.	X	X
DEAN, C.		
EVANS, B.L.		
FERNERA, D.W.		
FERRERA, D.W.		
GILLISON, W.R.		
GRANT, B.A.	$\boldsymbol{X}$	X
HERRING, C.L.		
HILL, J.A.		
HUEMAN, T.P.		
KELL, R.E.		
KELLY, G.M.		
MANI, V.		
VARTINEZ, L.A.		
NALLY, J.L.		
MoGOVERN, L.J.		
McKAY, R.		
McKIBBIN, J.G.		
OKEY, R.		
O'BRIEN, G.D.		
PANGERSIS, P.A.		
P:○HEY, C.L.		
OLIN, N.B.		
SHUMWAY, W.K.		
STAGG, R.		
STEELMAN, M.		
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Department of Energy Environmental Restoration Division Comments on the Phase I Interim Measure/Interim Remedial Action Decision Document for Operable Unit 7 - Present Landfill

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Robert Card, Vice President Environmental Restoration/Waste Management & Integration Kaiser-Hill Company, L.L.C.

Attached are the Department of Energy (DOE) Environmental Restoration Division comments on the Operable Unit (OU) 7 Interim Measure/Interim Remedial Action (IM/IRA) decision document.

Please note that the comments address several issues with the IM/IRA. Of greatest concern are the questions regarding funding and construction of the OU 7 slurry wall and wetland mitigation. DOE cannot concur on the final IM/IRA decision document until these issues are resolved.

These comments are provided for your consideration, and are not intended to impact the cost, schedule, or scope of the contract. If you believe there will be such an impact, you should immediately notify the COR and the Contracting Officer and not implement any action arising from these comments.

If you have any questions or comments, please call Kurt Muenchow at extension 2184.

Jessie Roberson, Assistant Manager

for Environmental Programs

Attachment

CORRES. CONTROL X X
ADMN RECORD/080
PATS/T130G

Reviewed for Addressee Corres, Control RFP

10/19/95 BY

Ref Ltr. #

DOE ORDER # 5400 . /

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# U.S. DEPARTMENT OF ENERGY ROCKY FLATS OFFICE

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COMMENT DECOR		3. Reviewer: MORT MUENCHOOL Signature and Date: 147 has	Organization: DOE-ER-RFFO	Location and Phone No. T117A x2184	clude suggested changes)	Executive Summary; page i - Last sentance, third paragraph:  This sentance is quite confusing as it is worded in a double-negative. I do not understand the sentance, and suggest that it be rewritten. Further, the Executive Summary should not use the term-of-art, "acceptable risk", since this risk assessment jargon is not well understood by the public. They may not see added risk as "acceptable", nor understand the concept of EPA-defined "acceptable risk range(s)". I suggest the use of layman terminology in the Executive Summary.	Page 1-4, Section 1.3; P.1-5, S.1.3.2; P.2-2; P.3-23, S.3.4.3.3; P.3-26, S.3.5.1.1; P.3-27, S.3.5.1.6; P.4-3, S.4.2.4; P.4-4, S.4.2.6; P.5-3, S.5.1.3; P.7-2, S.7.1; P.7-8, S.7.2.2.3; P.7-12, S.7.3.3; P.7-13, S.7.3.6; and P.7-15, S.7.5:	General - It is clear that construction/repair of the slurry wall is an integral part of successfully isolating the landfill from the surrounding environment. Without construction/maintenance of the slurry wall, the proposed remedy is incomplete. The reason that the slurry wall was proposed as a seperate maintenance action was so that it could be funded/completed quickly, and prior to construction of the proposed cap. Can the slurry wall physically be repaired	Ar LEK the proposed cap is in place, or is the existing sturry wall under the footprint of the cap? The slurry wall repair/construction must be funded prior to approval of the IM/IRA decision document.  Specific - Under "Slurry Wall Maintenance", the IM/IRA DD asserts that, "Construction of the slurry wall will occur in late 1995." Either the slurry wall activity must be funded for FY 96, or KH/DOE should NOT be committing to	construction.  On page 2-2, in the leachate discussion, the document asserts that, "(t)he volume [of leachate] is expected to decrease after the slurry wall [is] are in place." Either funding for the slurry wall must be found for FY 96, or this statement must be modified.  On page 2-23, the IM/IRA states that, "(a) slurry wall will be constructed as a
סב סבעובאי	איווישט יח	2. Document Reviewed: (Title, Number, Revision and Date) Phase I IM/IRA Decision Document for Operable Unit 7 -	Present Landfill. Draft Report. July 27, 1995		7. <u>Comments</u> (includ	Executive Summary; page i - Last sentance, third paragraph: This sentance is quite confusing as it is worded in a double-n understand the sentance, and suggest that it be rewritten. Fu Summary should not use the term-of-art, "acceptable risk", s assessment jargon is not well understood by the public. There isk as "acceptable", nor understand the concept of EPA-defirange(s)". I suggest the use of layman terminology in the Erange(s)".	Page 1-4, Section 1.3; P.1-5, S.1.3.2; S.3.5.1.1; P.3-27, S.3.5.1.6; P.4-3, S.P.7-2, S.7.1; P.7-8, S.7.2.2.3; P.7-12, S.7.5:	General - It is clear that construction/repair of the slurry wall is an integ of successfully isolating the landfill from the surrounding environment. Without construction/maintenance of the slurry wall, the proposed reme incomplete. The reason that the slurry wall was proposed as a seperate maintenance action was so that it could be funded/completed quickly, at construction of the proposed cap. Can the slurry wall physically be reported.	Arith the proposed cap is in place, or is in footprint of the cap? The slurry wall repair/approval of the IM/IRA decision document. Specific - Under "Slurry Wall Maintenance" "Construction of the slurry wall will occur i activity must be funded for FY 96, or KH/DC	construction.  On page 2-2, in the leachate discussion, [of leachate] is expected to decrease afte Either funding for the slurry wall must be modified.  On page 2-23, the IM/IRA states that, "(
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	Page <sup>2</sup> of <sup>6</sup>	4. Agreement with dispositions:	Reviewer	Document Preparer	Disposition						
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HOCKY FLATS OFFICE	COMMENT RECORD	3. Reviewer: Signature and Date:	Organization: DOE-ER-RFFO	Location and Phone No. T117A x2184	slude suggested changes)	On page 3-23, construction of the slurry wall, and attendant reduction of groundwater inflow, leachate generation, and seep outflow are cited as support for delisting the seep water. If the slurry wall is not constructed, how does this affect this delisting arguement?	In section 3.5.1.1, the slurry wall installation is cited as a piece of minimizing exposure to seep water/leachate. What is the impact on potential exposure if the slurry wall is not constructed?	Page 3-27 & 3-28, Section 3.5.1.6 cites construction of the slurry wall as contributing to reducing groundwater in flow and subsequent leachate generation by 94%. If the slurry wall in not built due to a lack of funding, what is the effect on the control/containment of the groundwater plume? Without the slurry wall, work a new sear form in the proposed on? Without a clurry wall,	won't a new seep form in the proposed cap? Without a stury wait, now will the groundwater plume be contained? What affect does continued groundwater inflow have on contaminant transport? The argument in this section fails without construction of the slurry wall. Either the slurry wall construction must be funded, or this argument must be completely re-analyzed and re-written to take into account the continued groundwater flow loading and subsequent plume migration and contaminant transport.	Section 4.2.4, "Containment", asserts that because, "the groundwater in the source area is presently contained laterally by the slurry wall" that, "(c)ontainment of the groundwater will not be addressed further in this report." This statement is unacceptable unless the slurry wall is funded and constructed. If the slurry wall activity is not funded, this entire section needs to be re-analyzed and re-written to describe containment of contaminated groundwater.	Similarly, section 4.2.5 uses reference to the unfunded slurry wall as justification for limiting "offsite migration of [landfill] gas". How will lateral gas migration
	RF REVIEW	2. Document Reviewed: (Title, Number, Revision and Date) Phase I IM/IRA Decision Document for Operable Unit 7 -	Present Landfill. Draft Report. July 27, 1995		t 7. <u>Comments</u> (includ	On page 3-23, construction of the slurry groundwater inflow, leachate generation for delisting the seep water. If the slurry affect this delisting arguement?	In section 3.5.1.1, the slurry wall instal exposure to seep water/leachate. What slurry wall is not constructed?	Page 3-27 & 3-28, Section 3.5.1.6 cites contributing to reducing groundwater in by 94%. If the slurry wall in not built do on the control/containment of the groundware, a new seed form in the proposed of	groundwater plume be contained? What affect does continued groundwater plume be contained? What affect does continued groundwater plume be contained? The argument in this section fails with construction of the slurry wall. Either the slurry wall construction mus funded, or this argument must be completely re-analyzed and re-written to take into account the continued groundwater flow loading and subsequence migration and contaminant transport.	Section 4.2.4, "Containment", asserts that because, "the groundwater source area is presently contained laterally by the slurry wall" that, "(c)ontainment of the groundwater will not be addressed further in this re. This statement is unacceptable unless the slurry wall is funded and construct the slurry wall activity is not funded, this entire section needs to be re-ar and re-written to describe containment of contaminated groundwater.	Similarly, section 4.2.5 uses reference for limiting "offsite migration of [land]
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COMMENT RECORD	3. Reviewer: Signature and Date:	Organization: DOE-ER-RFFO	Location and Phone No. T117A x2184	7. Comments (include suggested changes)	A full analysis and discussion of landfill required if the slurry wall is not	On page 5-3, a slope angle of 20 degrees is partially justified by exitance of an effective slurry wall which, "limit(s) groundwater inflow". How will this slope angle be justified if groundwater loadings are not reduced? Will the slope angle require modification? If so, what is the added cost? Does this cost exceed the cost of constructing the slurry wall? Would cap slumping and seepage occur on a groundwater-lubricated 20 degree slope?	The decument suggests that 93% of groundwater inflow would be eliminated with construction of the proposed slurry wall. How will this groundwater inflow and subsequent containment of the waste mass be effected without the slurry wall action?	Groundwater modelling showed that 60% of leachate is from groundwater inflow. The cap proposed in the IM/IRA addresses the 40% of leachate generated via infiltration. A majority of the leachate generation, therefore is not addressed in the IM/IRA, as the proposed slurry wall remains unfunded. Therefore, the proposed containment remedy presented in the IM/IRA is incomplete without construction of the slurry wall, and is not acceptable. DOE/KH must either fund and build the slurry wall, or describe in the IM/IRA alternatives how groundwater infiltration and subsequent contaminant migration will be addressed by the remedy.	If the slurry wall is not constructed, will water levels in the landfill waste mass be expected to decrease as asserted on page $7$ -12 & 13?	Section 7.3.6 states that recharge to the east landfill pond is greatly reduced as a
RF REVIEW	EVIEW ision and Date)			7. Comments (inc	be controlled without the slurry wall? A full analysis and discussion or gas collection/control/measurement is required if the slurry wall is not constructed.	On page 5-3, a slope angle of 20 degrees is perfective slurry wall which, "limit(s) groundslope angle be justified if groundwater loading angle require modification? If so, what is the the cost of constructing the slurry wall? Wou on a groundwater-lubricated 20 degree slope?	The dccument suggests that 93% of groun construction of the proposed slurry wall. subsequent containment of the waste masaction?	Groundwater modelling showed that 60% The cap proposed in the IM/IRA addresse infiltration. A majority of the leachate g the IM/IRA, as the proposed slurry wall r proposed containment remedy presented construction of the slurry wall, and is not and build the slurry wall, or describe in the infiltration and subsequent contaminant remedy.	If the slurry wall is not constructed, will be expected to decrease as asserted on pa	Section 7.3.6 states that recharge to 1
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Page 4 of 6	4. Agreement with dispositions:		Document Preparer	8. <u>Disposition</u>				
COMMENT RECORD	3. Reviewer: Signature and Date:	ation: DOE-ER-RFFO	Location and Phone No. T117A x2184	suggested changes)	ative is based on 60% of the slurry wall. Therefore, without the generation in the landfill is addressed and subsequent contamination arry wall. Therefore, this decision without funding and all in FY 96. Until this issue is ant to either the regulators or the public	ments cribed in the document. ond and/or associated wetlands being reviewed by DOE counsel. ey are recieved, and may require	as required. The document also hints ociated with SLPP will be used to lect is dependant upon both the SLPP ich should be described in summary, ific sites for mitigation, wetland types addressed in this document. Further,	ward. Finally, status of the "wetland a schedule for implementation should be cap construction proposal. Like the ler the impression that the wetland garaunteed to occur. As with the mitigation is far from a "done deal".
RF REVIEW COM	2. Document Reviewed: (Title, Number, Revision and Date) 3. Reviewer: Phase I IM/IRA Decision Document for Operable Unit 7 -	Present Landfill. Draft Report. July 27, 1995 Organization:	Location	7. Comments (include	Justification for the reccommended alternative is based on 60% of the groundwater inflow being stopped by the slurry wall. Therefore, without the slurry wall, less than half of the leachate generation in the landfill is addressed by the proposed alternative. Groundwater and subsequent contamination migration is not addressed without the slurry wall. Therefore, this decision document is unacceptable and incomplete without funding and construction/maintenance of the slurry wall in FY 96. Until this issue is resolved, DOE will not issue this document to either the regulators or the public for consideration.	Page 3-19, Section 3.4.2.1: Wetlands Requirements DOE Legal (OCC) is reviewing the ARARs described in the document. Specifically, the implication that the landfill pond and/or associated wetlands are "waters of the US" pursuant to the CWA, is being reviewed by DOE counsel DOE OCC comments will be forwarded when they are recieved, and may require re-wording of this section.	The document repeatedly refers to "wetland mitigation" being performed at Standley Lake Protection Project (SLPP) as required. The document also hints that some "wetland mitigation bank" associated with SLPP will be used to mitigate wetland destruction. If this project is dependant upon both the SLPP and the mitigation bank projects, then each should be described in summary, including a status of each project. Specific sites for mitigation, wetland types destroyed vs. mitigated, etc should be addressed in this document. Further,	schedule for mitigation should be put forward. Finally, status of the "wetland bank", including regulatory approval and schedule for implementation should be described as it affects the OU 7 IM/IRA cap construction proposal. Like the slurry wall, this document gives the reader the impression that the wetland mitigation has been accomplished, or is garaunteed to occur. As with the currently un-funded slurry wall, wetland mitigation is far from a "done deal".
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HUCKY FLAIS UFFICE	COMMENT RECORD	3. Reviewer: Signature and Date:	Organization: DOE-ER-RFFO	Location and Phone No. T117A x2184	7. <u>Comments</u> (include suggested changes)	The "wetland bank" has not been established and approved by the regulators. Wetlands at SLPP have not been constructed for "deposit" into the "bank" (are they even funded for construction?). These issues should be fully expounded upon and addressed in this document. Page 5-2 indicates that, "(p)lanting of wetland vegitation for the SLPP is scheduled for summer 1995." Did this happen? If not, when is it scheduled? Is this activity still funded? Are the plantiungs the right type (classification) of wetland for mitigation at OU ?? The document states that the mitigation bank is "in development". What is the status? What are the impacts of regulators noty approving the proposed bank in a timely manner?	Anticipated acreage and Cowardin Class of wetlands requiring mitigation should be described, as well as acreage, Cowardin Class, and location of replacement acreage.	Page 7-6 indicates that a 3:1 ratio for wetlands mitigation will be used, resulting in 3.6 acres of wetland being mitgated for OU 7 activities. Section 8.1.7, however, describes, "(a)pproximately 1.1 acres or wetlands are (to be) mitigated." 1.1 acres at a 3:1 ratio works out to 3.3 acres of mitigation, not 3.6 acres. Which is correct?	The document repeatedly refers to mitigation of Preble's Meadow Jumping Mouse (PMJM), and indicates that DOE will mitigate losses to habitat, "as needed". What determines this need? Is there a regulatory trigger of some kind? Either we plan to mitigate habitat, or we don't. If we wait for a listing decision, we either end up with not having to mitigate, or having to do a formal consultation with the USFWS pursuant to Section 7 of the Endangered Species Act. Please describe in the document how and when a decision to mitigate habitat will be made. Also, please describe what DOE plans to do as "habitat mitigation".
	RF REVIEW	2. Document Reviewed: (Title, Number, Revision and Date) Phase I IM/IRA Decision Document for Operable Unit 7 -	Report. July 27, 1995			The "wetland bank" has not been establiched wetlands at SLPP have not been construction?). They even funded for construction?). The upon and addressed in this document. P wetland vegitation for the SLPP is sched happen? If not, when is it scheduled? Is plantiungs the right type (classification) document states that the mitigation bank status? What are the impacts of regulate a timely manner?	Anticipated acreage and Cowardin C be described, as well as acreage, Co acreage.	Page 7-6 indicates that a 3:1 ratio for wetlands mitigation v in 3.6 acres of wetland being mitgated for OU 7 activities. however, describes, "(a)pproximately 1.1 acres or wetlands mitigated." 1.1 acres at a 3:1 ratio works out to 3.3 acres acres. Which is correct?	The document repeatedly refers to mitigation of Preble's Meadow Ju (PMJM), and indicates that DOE will mitigate losses to habitat, "as What determines this need? Is there a regulatory trigger of some kin plan to mitigate habitat, or we don't. If we wait for a listing decision and up with not having to mitigate, or having to do a formal consult the USFWS pursuant to Section 7 of the Endangered Species Act. Plin the document how and when a decision to mitigate habitat will be Also, please describe what DOE plans to do as "habitat mitigation"
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3. Reviewer: Signature and Date:	Organization: DOE-ER-RFFO	Location and Phone No. T117A x2184	ude suggested changes)	(t)wenty-six of the monitoring wells at OU ndfill cap have been abandoned as a H proposed to accelerate closure of wells int early in FY 1995. Have these wells, in me wells that were a part of the the regulators last year? Were these wells hanned, then set aside due to funding	to commercially exploitable mineral segregates, Inc. currently proposes to mine			
· · · · · · · · · · · · · · · · · · ·	Report. July 27, 1995			Page 8-4, Section 8.1.6 states that, " (7 that fall under the footprint of the lasseperate maintenance action." DOE/K located under the proposed cap footprifact, been abandoned? Are they the satearly-closure proposal DOE issued to tactually abandoned, or was the work p considerations?	Page 9-17 asserts that there are, " n resources at Rocky Flats." Western A areas on the Rocky Flats Reservation.			
Occument Reviewe se I IM/IRA Decision	ent Landfill. Draft			ш	邱			
	ision and Date) 3. Reviewer:  Signature and Date:  4. Agreement with other or and Date:	3. Reviewer: Signature and Date: Organization: DOE-ER-RFFO Date	3. Reviewer: Signature and Date: Organization: DOE-ER-RFO  Location and Phone No. T117A x2184	3. Reviewer: Signature and Date: Organization: DOE-ER-RFO  Location and Phone No. T117A x2184  clude suggested changes)  8. Disposition	3. Reviewer: Signature and Date: Signature and Date: Organization: DOE-ER-RFFO  Organization: DOE-ER-RFFO  Location and Phone No. T117A x2184  Location and Phone No. T117A x2184  Clude suggested changes)  (I) wenty-six of the monitoring wells at OU landfill cap have been abandoned as a RKH proposed to accelerate closure of wells print early in FY 1995. Have these wells, in same wells that were a part of the other regulators last year? Were these wells planned, then set aside due to funding	Document Reviewed: (Title, Number, Revision and Date)  Signature and Date:  Signature and Date:  Signature and Date:  Location Document for Operable Unit 7 -  Signature and Date:  Location and Phone No. T117A x2184  Signature and Phone No. T117A x2184  Location and Phone No. T117A x2184  S. Gomment Type  Page 8-4, Section 8.1.6 states that, "()wenty-six of the monitoring wells at OU 7 that fall under the footprint of the landfill cap have been abandoned as a seperate maintenance action." DOE/KIA proposed to accelerate closure of wells located under the proposed cap footprint early in FY 1995. Have these wells, in fact, been abandoned? Are they the same wells that were a part of the early-closure proposed Cap footprint early in FY 1995. Have these wells actually abandoned, or was the work planned, then set aside due to funding considerations?  E Page 9-17 asserts that there are, " no commercially exploitable mineral resources at Rocky Flats." Western Aggregates, Inc. currently proposes to mine areas on the Rocky Flats Reservation.	Document Reviewed: (Title, Number, Revision and Date)  3. Reviewer:  Signature and Date:  Signature and Date:  Signature and Date:  Signature and Date:  Organization:  DOE-ER-RFFO  Date  Location and Phone No. Ti17A x2184  Software to comment  Type  Page 8-4, Section 8.16 states that." (U)wenty-six of the monitoring wells at OU  That fall under the footprint of the Indfill cap have been abandoned as a generate maintenance action." DOE/ER/RIP proposed to accelerate closure of wells in fact, been abandoned? Are they the same wells that were a part of the early-closure proposal DOE issued to the regulators last year? Were these wells actually abandoned, or was the work planned, then set aside due to funding considerations?  E Page 9-17 asserts that there are, " no commercially exploitable mineral resources at Rocky Flats." Western Aggregates, Inc. currently proposes to mine areas on the Rocky Flats Reservation.	Document Reviewed: (Title, Number, Revision and Date)  seer Landfill. Draft Report. July 27, 1995  Signature and Date:  Type  Page 84, Section 8.16 states that, "()wenty-six of the monitoring wells at OU page appropriate maintenance action." DDE/H proposed to accelerate closure of wells in fact, been abandoned as a seperate maintenance action. DDE/H proposed to section state closure of wells in fact, been abandoned Are they the same wells that were a part of the early-closure proposed appropriate action. DDE/H proposed states wells accorded to the same wells that were a part of the same wells that early in FY 1995. Heve these wells accorded to the same wells that were a part of the same wells that accorded to the sa

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